

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ADAM BROWN, on Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

v.

LEARFIELD COMMUNICATIONS, LLC,
SIDEARM SPORTS, LLC, UNIVERSITY
OF TEXAS AT AUSTIN, and THE
UNIVERSITY OF TEXAS AT AUSTIN
ATHLETICS,

Defendants.

Case No.: 1:23-cv-00374-DAE

Hon. David A. Ezra

UNSWORN DECLARATION OF PATRICK YARBOROUGH


My name is Patrick Yarborough, and I am an attorney for Plaintiff in this case. I have personal knowledge of Plaintiff's investigation and receipt of documents submitted in support of Plaintiff's Response in Opposition to Defendant Learfield Communications, LLC's and Sidearm Sports, LLC'S 12(b)(1), 12(b)(6), and 12(b)(7) Motion to Dismiss Plaintiff's Complaint.

1. Attached as **Exhibit 1** to this Declaration is a true and correct copy of Senate Report 100-599, which is publicly available and was obtained in the course of Plaintiff's counsel's investigation.

2. Attached as **Exhibit 2** to this Declaration is a copy of the decision on the motion to dismiss in *Stoudemire et al. v. Lee Enterprises, Inc.*, Case No. 3:22-cv-00086 (S.D. Iowa July 20, 2023).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 4, 2023.



Patrick Yarborough